Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)

Dear Commissioners:

Re:

WACA TV submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

WACA TV is a Community Media Center, which runs 3 channels, Public, Education and Government. We provide information to Ashland Cable subscribers. We give our viewers a variety of programs from religious show, to entertainment and cooking shows, government meetings, school sports and much more. We provide 100 hours/week of programming on our 3 channels Our programming is available to 7000 subscriber households in the Town of Ashland, MA.

However, currently, Verizon and Comcast now only displays a local programming next to our channels no description. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information to include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Barbara Chisholm

Executive Director

Reply To Comments # 12-108

WACA TV, Ashland Cable Access Corp, 200 Butterfield Drive, B1, Ashland, MA